



Mr. Craig Dufficy
U.S. Environmental Protection Agency (5304P)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: *American Municipal Power, Inc., Richard H. Gorsuch Power Station
Response to USEPA Request for Information under CERCLA
Section 104(e) Dated August 24, 2010*

Dear Mr. Dufficy:

This letter is in response to USEPA's request for information under CERCLA Section 104(e) directed to American Municipal Power, Inc. ("AMP") with respect to the Richard H. Gorsuch Power Station in Marietta, Ohio. USEPA's request was dated August 24, 2010 and received by AMP on August 25, 2010.¹ Specifically, "Enclosure A" of the information request directs AMP to:

(P)rovide the information below for each surface impoundment or similar diked or bermed management units(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag or flue gas emission control residuals. This includes units that no longer receive coal combustion residues or by-products, but still contain free liquids.

¹ AMP requested a ten (10) day extension to respond (until September 17, 2010) in a letter to you dated September 3, 2010 and in contemporaneous phone messages.

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The Gorsuch Power Station is a coal burning power station and generates fly ash and other by-products from the combustion of coal. However, all residuals and other by-products from the combustion of coal are transported in dry form to the permitted residual solid waste landfill operated by AMP. The landfill does not accept any liquid-borne waste material. Accordingly, AMP does not believe that the August 24, 2010 information request is relevant to operations at the Gorsuch Power Station. The Gorsuch Power Station does not own, maintain or operate any surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of coal combustion residuals or by-products.

Please be advised that AMP will permanently cease operation of the Gorsuch Station on or before December 31, 2010. Although some wastes will be generated during facility decommissioning, no waste will be disposed of in a manner relevant to this information request.

The following provides AMP's response to the specific information requests.

Enclosure A

Please provide the information requested below for each surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. This includes units that no longer receive coal combustion residues or by-products, but still contain free liquids

1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit(s) does not have a rating, please note that fact.

Not applicable.

2. What year was each management unit commissioned and expanded?

Not applicable.

3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other", please specify the other types of materials that are temporarily or permanently contained in the unit(s).

Not applicable.

4. Was the management unit (s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?

Not applicable.

5. When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?

Not applicable.

6. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation. Please provide a copy of the most recent official inspection report or evaluation.

Not applicable.

7. Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.

Not applicable.

8. What is the surface area (acres) and total storage capacity of each of the management unit(s)? What is the volume of material currently stored in each of the management unit(s)? Please provide the dates that the volume measurement(s) was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.

Not applicable.

9. Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).

Not applicable.

10. Please identify all current legal owner(s) and operator(s) at the facility.

The current owner and operator of the property is American Municipal Power, Inc., 1111 Schrock Road, Suite 100, Columbus, Ohio 43229.

On behalf of AMP, I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate, and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, has certified under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fines and imprisonment for knowing violations.

Sincerely,


Michael Perry
Vice President of Generation Operations

CC: Randy Meyer
Scott Doran